

# EXHIBIT G

**Exhibit G to the Greenbaum Declaration**

<b>Document Title/ECF No.</b>	<b>Basis for Sealing</b>	<b>Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted</b>	<b>Why a Less Restrictive Alternative to the Relief Sought is Not Available</b>	<b>Any Prior Order Sealing the Same Materials in the Pending Action</b>	<b>Party in Opposition to Sealing, if any, and Basis</b>
Exhibit 12 to letter dated April 19, 2024 [ECF No. 312]	Exhibit 12 is a letter from counsel for Save On SP LLC (“SaveOn”) to counsel for Johnson & Johnson Health Care Systems, Inc. (with its affiliates, “J&J”). Exhibit 12 references information about SaveOn’s business strategy—comprising proprietary business information—obtained by J&J through discovery. <i>See</i> ECF No. 312 at Ex. 12.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	A redacted, public version of the Letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn’s proprietary business information.	No	No objection
Exhibit 39 to letter dated April 19, 2024 [ECF No. 312]	Exhibit 39 is a confidential deposition transcript of a SaveOn employee, containing direct and substantive reference to SaveOn’s business strategy, comprising proprietary	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn’s proprietary business information.	Yes. <i>See, e.g.,</i> ECF No. 287 at Ex. 3.	No objection

	business information. <i>See ECF No. 312 at Ex. 39.</i>				
Exhibit 40 to letter dated April 19, 2024 [ECF No. 312]	Exhibit 40 is a recording of a call made by a SaveOn employee to J&J. The call contains confidential patient health information, including a patient's birth date and address. <i>See ECF No. 312 at Ex. 40.</i>	If relief is not granted, the patient would be harmed by the disclosure of their confidential health information.	It is believed that no less restrictive alternative is available to prevent the disclosure of the patient's confidential health information.	No	No objection
Exhibit 41 to letter dated April 19, 2024 [ECF No. 312]	Exhibit 41 is a recording of a call made by a SaveOn employee to J&J. The call contains confidential patient health information, including a patient's birth date and address. <i>See ECF No. 312 at Ex. 41.</i>	If relief is not granted, the patient would be harmed by the disclosure of their confidential health information.	It is believed that no less restrictive alternative is available to prevent the disclosure of the patient's confidential health information.	No	No objection
Exhibit 46 to letter dated April 19, 2024 [ECF No. 312]	Exhibit 46 is a letter from counsel for J&J to counsel for SaveOn. The letter discusses SaveOn's designation of a deposition transcript, <i>see ECF No. 312 at Ex. 39</i> , as "Attorneys' Eyes Only." The letter quotes from and characterizes	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	A redacted, public version of the Letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

	the deposition transcript, which contains SaveOn's business strategy, comprising proprietary business information. <i>See ECF No. 312 at Ex. 46.</i>				
Exhibit 47 to letter dated April 19, 2024 [ECF No. 312]	Exhibit 47 is a letter from counsel for J&J to counsel for SaveOn. Exhibit 47 references information about SaveOn's business strategy—comprising proprietary business information—obtained by J&J through discovery. <i>See ECF No. 312 at Ex. 47.</i>	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	A redacted, public version of the Letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 31 to letter dated May 7, 2024 [ECF No. 312]	Exhibit 31 is a letter from counsel for SaveOn to counsel for J&J. Exhibit 31 references SaveOn's operating strategy and protocols for its call centers, comprising proprietary business information obtained by J&J through discovery. <i>See ECF No. 312 at Ex. 31.</i>	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	A redacted, public version of the Letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

Exhibit 39 to letter dated May 7, 2024 [ECF No. 312]	Exhibit 39 is an image of a patient's profile from J&J's Salesforce platform. Exhibit 39 contains confidential patient health information, including identifying ID numbers and the patient's date of birth.	If relief is not granted, the patient would be harmed by the disclosure of their confidential health information.	A redacted, public version of the Image is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of the patient's confidential health information.	No	No objection
Exhibit 41 to letter dated May 7, 2024 [ECF No. 312]	Exhibit 41 is a recording and transcript of a call made by a SaveOn employee to J&J. The call contains confidential patient health information, including a patient's birth date and address. <i>See</i> ECF No. 312 at Ex. 41.	If relief is not granted, the patient would be harmed by the disclosure of their confidential health information.	A redacted, public version of the Transcript is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of the patient's confidential health information.  The recording is being sealed because it is believed that no less restrictive alternative is available to prevent the disclosure of the patient's confidential health information.	No	No objection
Exhibit 42 to letter dated May 7, 2024 [ECF No. 312]	Exhibit 42 is a recording and transcript of a call made by a SaveOn employee to J&J. The call contains confidential patient health	If relief is not granted, the patient would be harmed by the disclosure of their confidential health information.	A redacted, public version of the Transcript is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of	No	No objection

	information, including a patient's birth date and address. <i>See</i> ECF No. 312 at Ex. 42.		the patient's confidential health information.  The recording is being sealed because it is believed that no less restrictive alternative is available to prevent the disclosure of the patient's confidential health information.		
Exhibit 43 to letter dated May 7, 2024 [ECF No. 312]	Exhibit 43 is a confidential deposition transcript of a SaveOn employee, containing direct and substantive reference to the contents of SaveOn's business strategy. <i>See</i> ECF No. 312 at Ex. 43.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	Yes. <i>See, e.g.</i> , ECF No. 287 at Ex. 3.	No objection
Exhibit 56 to letter dated May 14, 2024 [ECF No. 312]	Exhibit 56 is a spreadsheet containing patient data for patients enrolled in CarePath. Exhibit 56 contains confidential patient health information, including patients' dates of birth and addresses. <i>See</i> ECF No. 312 at Ex. 56.	If relief is not granted, the patient would be harmed by the disclosure of their confidential health information.	It is believed that no less restrictive alternative is available to prevent the disclosure of the patient's confidential health information.	No	No objection